

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF HOME)	
ENERGY ASSISTANCE PROGRAMS OFFERED)	CASE NO.
BY INVESTOR-OWNED UTILITIES PURSUANT)	2019-00366
TO KRS 278.285(4))	

COMMISSION STAFF'S POST-FORMAL CONFERENCE REQUEST FOR
INFORMATION TO PARTIES

Community Action Kentucky, Inc. (CAK); Columbia Gas of Kentucky, Inc. (Columbia Kentucky); Delta Natural Gas Company, Inc. (Delta); Duke Energy Kentucky, Inc. (Duke Kentucky); Louisville Gas and Electric Company (LG&E); Kentucky-American (Kentucky American); Kentucky Utilities Company (KU); and Kentucky Power Company (Kentucky Power) (collectively, Parties), pursuant to 807 KAR 5:001, are to file with the Commission their respective original and an electronic version of the following information. The information requested is due on March 6, 2020. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The Parties shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the Parties fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, the Parties shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, Kentucky Power

1. Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, shall provide the following information for January 1, 2015, until December 31, 2019. If a utility has both electric and gas residential customers, provide the information requested for electric residential customers, gas residential customers, and the total number of residential customers.

a. Total number of residential customers for each year.

b. Monthly and annual totals of service termination notices issued to residential customers only for non-payment of bills.

c. Monthly and annual totals of service termination for residential customers only for non-payment of bills.

d. Monthly and annual total amount of unique residential customers issued service termination notices for non-payment of bills.

e. Monthly and annual total amount of unique residential customers with service terminated for non-payment of bills.

2. For each month from January 1, 2015, to December 31, 2019, Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, should provide the total number of LIHEAP recipients, HEA recipients and customers who received both LIHEAP and HEA benefits.

3. For each month from January 1, 2015, to December 31, 2019, Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, should provide the monthly total average residential bill that includes the cost of current service and arrearages. For utilities that provide gas and electric service, break out the amounts by gas-only, electric-only, and combined gas and electric customers.

4. Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, should explain how its process currently in place for disconnection of residential service for non-payment complies with the applicable sections of 807 KAR 5:006, Sections 14 and 15. Provide sample bills or inserts that evidence compliance with those applicable sections.

Kentucky Utilities

5. Confirm that a customer can only receive Wintercare if they have received a disconnect notice from the utility.

Kentucky-American

6. Explain whether Kentucky-American considers forgiveness of arrears in concert with existing Home Energy Assistance (HEA) program.

Columbia Kentucky

7. Refer to Columbia Kentucky's Response to Staff's Third Request for Information, No. 1 Amendment.

a. For all residential customers, provide the following information for each of the last five years:

(1) The average monthly bill for all residential customers for each month from November to March.

(2) The average monthly bill for residential customers receiving HEA benefits for each month from November to March.

(3) The average monthly bill for residential customers receiving LIHEAP benefits for each month from November to March.

b. For all HEA customers, provide the following prior to the HEA credit is applied:

(1) The average monthly bill for all residential customers for each month from November to March.

(2) The average monthly bill for residential customers receiving HEA benefits for each month from November to March.

(3) The average monthly bill for residential customers receiving LIHEAP benefits for each month from November to March.

8. Provide the bill insert for the HEA program provided to customers when a termination notice is mailed.

9. For the last five years, provide the administration fees paid for the HEA program as a percentage of actual funds distrusted.

CAK

10. Identify the differences in the application process between an application for a subsidy and an application for crisis so to support different costs associated with each.

11. Explain whether there is a correlation between a county's LIHEAP fund allocation and the number of empty HEA slots for that county.

12. Prove the amount of counsel fees that are related to case intervention and charged against the HEA programs for the last five years.

Duke Kentucky

13. Refer to Duke Kentucky's response to Commission Staff's Third Request for Information, Item 6. Provide the averages requested in subparts b and c broken out by residential gas-only, electric-only, and combined gas and electric.

LG&E

14. The purpose of the Affordable Energy Corporation (AEC) is to increase the affordability of a customer's utilities. Explain whether the affordability measure, or the percent of utility bill for income, has ever been readjusted. If so, explain the amount of and the reasons for the readjustment.

15. Provide the following information by month for each month between January 1, 2015, and December 31, 2019.

- a. The average monthly residential bill for electric-only customers.
- b. The average monthly residential bill for gas-only customers.
- c. The average monthly residential bill for combined gas and electric customers.

16. Refer to LG&E's response to Commission Staff's Third Request for Information, Item 10. Provide the averages requested in subparts b and c broken out by residential gas-only, electric-only and combined gas and electric.

17. Provide the average administration fee paid to Wintercare and the percent of this payment as compared to total funds distributed to Wintercare for the last three years.

KU

18. State whether legal fees incurred by Community Action Council of Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc., as a result of intervening in KU's rate cases since 2014, were included in HEA administrative fees charged to and paid by KU.

Delta

19. Provide the annual average of past-due accounts for the past five years.

20. Provide the training materials referencing the HEA program used by the Customer Service Representatives and the materials used when hand delivering termination notices to homes.



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DATED **FEB 26 2020**

cc: Parties of Record

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